

# EXHIBIT D

**ACKERMANN & TILAJEF, P.C.**

Craig J. Ackermann (SBN 229832)

[cja@ackermanntilajef.com](mailto:cja@ackermanntilajef.com)

Avi Kreitenberg (SBN 266571)

[ak@ackermanntilajef.com](mailto:ak@ackermanntilajef.com)

315 South Beverly Drive, Suite 504

Beverly Hills, California 90212

Telephone: (310) 277-0614

Facsimile: (310) 277-0635

*Attorneys for Movants***UNITED STATES BANKRUPTCY COURT****FOR THE DISTRICT OF DELAWARE**IN RE YELLOW CORPORATION, ET  
AL<sup>1</sup>.

Debtors.

**DECLARATION OF KELLY CREPEAULT**

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211

1 I, Kelly Crepeault, declare as follows:

2 1. I am over 18 years old and a resident of Riverside County, California. I have personal  
3 knowledge of the facts set forth in this declaration, and if called upon, I could and would testify  
4 competently thereto.

5 2. I submit this declaration in support of my motion, filed herewith (the "Motion"),  
6 requesting this Court to modify the automatic stay to permit my counsel to send to the California  
7 Labor and Workforce Development Agency ("LWDA") the letter attached as an exhibit to the  
8 Motion.

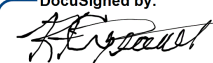
9 3. I was employed by YRC Inc. ("YRC") for 19 years until I was terminated from my  
10 employment with YRC on July 30, 2023 as part of YRC's shutdown. Upon my termination, YRC  
11 did not pay me all wages owed to me including accrued PTO pay. Upon information and belief,  
12 most other California employees of YRC were similarly terminated on or about July 30, 2023, and  
13 at least some, if not all, such fellow terminated employees similarly did not receive monies due them,  
14 at the time they were due, upon such termination. I am advised by counsel these acts and omissions  
15 subject YRC to penalties under California state law.

16 4. I understand that the probable consequence of the grant of the motion will be my  
17 authorization to seek penalties from YRC on behalf of LWDA and my fellow aggrieved employees,  
18 in this case by way of the filing of one more Chapter 11 proofs of claim, and I am willing and, with  
19 the assistance of my counsel, able to do so.

20 I declare under penalty of perjury under the laws of the United States and the State of  
21 California that the foregoing is true and correct.

22 Executed on 1/11/2024 | 9:22 AM PST in 01/11/2024, California

23  
24 By:

DocuSigned by:  
  
F276E299ED1B4D3...

25 Kelly Crepeault  
26  
27  
28